

**Libby Asbestos Site****FY 2003 Recap and General Site Update as of November 1, 2003**

(all number are estimates)

Operable Unit 1. Former Export Plant/Millworks West.

The cleanup was completed in 2002. Restoration efforts, which included relocation of Millworks West Lumber are nearly complete. Some restoration of the buildings at the new Millworks West location occurred in 2003. Only minor paving remains and should be completed in the next few weeks. Upon completion of paving, all actions will be complete for OU1.

Operable Unit 2. Former Screening Plant.

Raintree Nursery/Parker Property. The cleanup of the primary screening plant parcel was completed in 2002. Extensive restoration efforts began in 2002 and are nearing completion now. Restoration included recontouring (2002), backfilling and topsoil placement (2003), revegetation (2003), restocking of former nursery items and stock (2003); reshaping Rainy Creek (2002) and Kootenai River banks (2002); replacement of gravel roads (2003); restoration of infrastructure not covered in settlement with property owners (2003). Property owners will return to the property in December and begin rebuilding their home and business. Approximately \$1,000,000 was spent on this effort with 2003 funds, but this amount was slightly offset by other money left over from 2002.

Parker Property on mine side of Highway 37. This property straddles Rainy Creek Road as it meets Highway 37. Additional sampling completed in 2003 indicated nearly all of this parcel was contaminated with trace levels in soil. Cleanup and restoration of this area is beginning now and may be completed this year, weather dependent. This cleanup is estimated to cost at least \$70,000.

Flyway Property. EPA cleaned up a portion of this property in 2001. EPA and W.R. Grace entered into an Administrative Order on Consent in 2002 for W.R. Grace to cleanup the remainder and pay advanced oversight costs to EPA. W.R. Grace is currently developing the necessary work documents to conduct this work in summer 2004.

Wise Property. A small parcel located between former screening plant and Flyway. EPA will cleanup this parcel in 2004 during/after completion of the Flyway cleanup by W.R. Grace.

Bluffs. EPA cleaned up most of this area in 2001. Some minor contamination remains. The need for additional cleanup will not be determined until completion of a risk assessment and record of decisions.

Operable Unit 3. Mine and Mine Road.

Approximately 1/2 of the mine road was paved in 2002. This makes the environment safer for

workers and makes decontamination more efficient. Contaminated soil from all cleanups is placed at the mine. Operation of the mine for disposal requires at least five full time laborers/operators for the entire construction season. No additional cleanup for the mine or mine road is contemplated until after completion of an RI/FS. RI/FS may be conducted by W.R. Grace or EPA depending on several factors.

Operable Unit 0/4. Site-wide removal/remedial.

Residential/Commercial Sampling. EPA conducted a large screening/sampling event in 2002 and 2003. Ultimately over 4000 properties in the Libby area were screened and sampled (including 12 "complex" properties requiring their own property specific sampling plan such as a former landfill, Stimson mill, the dirt/gravel alleys in Libby, etc). Based upon visual inspection results, approximately 1300 properties (400 indoor, 900 outdoor, significant overlap) require cleanup at this time. We conducted follow up RI sampling at about 500 properties in 2003. About 400 properties still have not been accessed. Number of properties requiring cleanup will be refined up or down based upon receipt of soil and dust sample results from screening and follow-up sampling, completion of a final risk assessment, and publication of a record of decision.

Residential/Commercial Design and Cleanup. As of November 1, we had completed property specific pre-designs/work plans for about 250 properties. We will continue the design effort at approximately 5 per week. As of November 1, approximately 170 properties will have been cleaned up (roughly 70 indoor, 70 outdoor, 30 combo) including several large, complex properties. Eight additional partial cleanups to address emergency situations (e.g. house fires) were also conducted. By the end of this calendar year, we expect to have cleaned up about 200 properties, about 180 with FY2003 funds. Contingent upon funding and any new discoveries (such as the boat ramp), EPA aims to clean up approximately 200-250 properties each additional year. Average cleanup contractor cost per property for the year was between \$40,000 and \$50,000 per property. Several difficult properties are forecast for next year, including demolition of a house and potential cleanup of Libby Golf Course greens, which are built on vermiculite from the mine and are scheduled to be ripped up and replaced next year.

Boat Ramp. During routine excavation activities by the City of Libby, asbestos contaminated soil was discovered near the former export plant along the banks of the Kootenai River. EPA is currently cleaning this 5 acre parcel, excavating contamination up to three feet deep. This is expected to be complete in a few weeks. The cost of this cleanup will be approximately \$200,000.

Stimson Mill. Closed in 2003. A new Port Authority formed in Lincoln County in 2003 will take ownership of the mill property in November. EPA plans two cleanups at the former mill in 2004: removal of vermiculite insulation from the central maintenance building and cleanup of former nursery property. Cost estimates are being developed now, but approximately \$500,000 is realistic for both actions. An important redevelopment property and issue.

RI/FS. EPA continues some investigation work including sampling, completion of an animal

dosing study, performance evaluation study, and sample analysis. Some of this work, including the animal study, was delayed in 2003 due to funding shortfalls. Upon completion of this work, we will set final cleanup levels and make final decisions for residential/commercial cleanup. This is expected in 2005.

- **PE Study.** Enough of this study was completed to choose analytical methods for the 15,000 soil samples awaiting analysis. We are using a modified form of PLM (samples are ground) for most of the analysis. Other methods will be used as necessary in certain situations. Last phase of PE study will occur this year and will include development of actual PE samples for inclusion in the QA train.
- **Soil Sample Analysis.** Roughly 5000 samples have been prepped and about 1000 have been analyzed. Currently, about 20% of all samples are showing trace asbestos. Few have greater than 1%. This is expected given that we do not sample where visible vermiculite or mine waste is present (that is where high levels are). We are beginning to analyze trends with this data now.
- **Animal Study for non-cancer effects.** Is designed and was peer reviewed. Contracting is beginning now. We must have a contractor able to perform such complex studies (likely Battelle) on board before we can finalize details of the study and resulting costs.
- **Post-cleanup sampling.** Early this winter, we will revisit some homes that were cleaned and cleared to collect personal samples, air samples, and dust samples. This is the best indicator of the success of cleanup strategy, gives actual post-cleanup exposure information, and will be used in the baseline risk assessment.

Asbestos Landfill Cell. In 2002, EPA constructed an asbestos cell at the Lincoln County Landfill. The cell is required for disposal of vermiculite insulation and construction debris. The cell became operational in July 2003 and is permitted by the Montana DEQ. While we operated six days per week in the summer to catch up with backlog, it will generally be open 1-2 days per week all year in the future.

High School Tracks. Cleanup was completed in 2001. In 2003, the high school track was finished with a special rubberized surface. Restoration is now complete.

Other Site-Wide Activities

Cleanup contractors. Continue to use mix of ERRS contract, Volpe contractor, and locally awarded contracts (top soil, trucking, security, etc) through the end of calendar year 2003. Volpe Center (DOT) will award \$37M multiple award site-specific contract for remediation in December 2003 or January 2004.

O&M Workgroup. EPA is starting an O&M work group to begin addressing long-term issues such as comfort letters, local IC's, long-term education, disposition of insulation not removed, new discoveries of contamination, landfill, etc. First meeting will be in November.

TAG. TAG became operational in early 2003 and is now VERY active. Involved in document

review, individual work-plans for property owners, and other aspects.

Risk Communication Training. EPA conducted risk communication/resident interaction training for on-site contractors and the TAG in August. Training was geared at dealing with expectations, perceptions, and emotions encountered with residents. Very successful and well-received.

Redevelopment Conference. In May, EPA sponsored a redevelopment conference at a cost of about \$25,000. It was very successful - many of the topics led to on-the-ground initiatives or actions in Libby and Troy. A follow up workshop is occurring in November for which we are providing minimal support.

Health Care. EPA continues to work with local partners and other agencies to improve access to health care and utilization of existing resources.

Database. EPA is upgrading to hand-held data entry for design work and improving GIS capabilities. This will aid in property selection for cleanup and save labor dollars over the long-term. On-going data entry, validation, queries, etc for databased that houses about 80,000 individual sample results. In the course of investigation, design, oversight, health and safety, and clearance we collected in excess of 50 samples per day over the course of the year.

Information Center. We continue to operate the EPA Info Center five days per week. Usage is exceptionally high because of residential cleanups. We provide sample results frequently, schedule future sampling, write comfort letters, and provide general information. Our contractors participate in numerous community programs.

Local labor. Roughly 90% of our cleanup workers were local hires this year. We estimated over \$10M of the Libby budget went directly into the Libby economy. This information was published in the local papers.

Operable Unit 5. Stimson Mill (will not be handled as separate OU).

Operable Unit 6. Burlington Northern Santa Fe Railyard.

In 2002, EPA entered into an AOC with BNSF to conduct cleanup of the rail yard near the former export plant. Work began in August 2003. BNSF was unable to attain clearance standards in soil, so work was stopped by mutual agreement. BNSF is forming a new work plan and will resume work in the spring.

Troy.

EPA entered into a cooperative agreement with MDEQ to conduct investigation and cleanup of Troy. Work will begin when funding is received. Little is known about the contamination in *Troy*.